

### **REMARKS**

In response to the Office Action dated May 31, 2007, Applicants respectfully request reconsideration.

#### **35 U.S.C. § 103 rejections**

Claims 1-2, 5-26, and 28-32 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,952,698 (Delaire) in view of U.S. Patent No. 6,401,097 (McCotter).

Regarding claim 1, Applicants respectfully assert that the Examiner has not established a *prima facie* case of obviousness under M.P.E.P. § 2143, which requires that “the prior art reference (or references when combined) must teach or suggest all the claim limitations.” (Emphasis added). Applicants respectfully assert that the Examiner has not shown how Delaire or McCotter teach or suggest certain limitations of the claims. For example, there is no reference to how Delaire or McCotter teaches i) a volume manager that is configured to manage metadata relating to electronic files on a volume, ii) a workflow module configured to automatically perform an event-driven action corresponding to a trigger event in response to the trigger event occurring, and iii) the event-driven action providing automated handling of at least one of folders, the electronic files, and the metadata relating to the electronic files.

Notwithstanding Applicants’ assertion that a *prima facie* case of obviousness has not been established, Delaire in view of McCotter does not teach, disclose, suggest, or make obvious a computerized file management system as recited in claim 1.

The Examiner cites various portions of Delaire as disclosing the volume manager recited in claim 1. While Delaire uses the phrase “volume manager,” the volume manager discussed in Delaire is different from the volume manager recited in claim 1. Delaire discusses a system that manages a storage area network having hosts that are coupled with storage devices via an interconnect fabric. Col. 21, ll. 33. The management of the storage area network is limited to the structure of the overall storage area network and not individual files contained therein. *See e.g. id.* at Figures 1-2, col. 21, ll. 29-44, col. 22, ll. 48-63. For example, Delaire collects information allowing it to discern the

makeup, topology, and status of the storage area network and its components in order to implement policies such as assignment of a storage device to a host (i.e. not management of individual files). *Id.*, col. 22, ll. 48-56. Furthermore, while the Examiner cites to col. 54, l. 43 of Delaire as disclosing “configured to manage electronic files” the cited portion refers to “file systems,” not individual files. In contrast to Delaire, claim 1 recites a volume manager configured to manage electronic files on a volume and to manage metadata relating to the electronic files.

Regarding McCotter, the Examiner cites col. 3, ll. 8-22 and 50-65 and col. 4, ll. 1-3 and 7-24 as teaching “a workflow module to perform event-driven action corresponding to a trigger, trigger events to change to content [sic] of selected file and ... a file operation; and event-driven action of metadata relating to electronic files.” The cited portions of McCotter discuss viewing, modifying, or adding metadata and providing a alternative view of a folder’s content. *Id.* at col. 3, ll. 58-59 and col. 4, ll. 7-16. A user is also presented with a list of available metadata fields and may select different views of a folder’s content by selecting the metadata fields to be displayed. *Id.* at col. 4, ll. 7-24. None of the cited portions of McCotter (nor any other portions of McCotter) discuss a workflow module that automatically performs an event-driven action corresponding to a trigger-event in response to the trigger event occurring, as recited in claim 1. If the Examiner maintains the present rejection, Applicants respectfully request that the Examiner provide the reasoning behind how McCotter teaches automatically performing an event-driven action ... in response to a trigger event occurring, such that applicants have the opportunity to reply completely. See e.g. M.P.E.P. § 706 (“The pertinence of each reference, if not apparent, must be clearly explained and each rejected claim specified.”).

Furthermore, assuming, *arguendo*, that McCotter discloses the workflow module recited in claim 1, McCotter still does not teach a trigger event as recited in claim 1 because claim 1 recites that a trigger event relates to at least one of i) a change to the metadata of the selected file, ii) a change to the content of the selected file, and iii) a file operation of the selected file. The cited portions of McCotter discuss viewing, modifying, or adding metadata. *Id.* at 58-59. McCotter, however, does not discuss that any events automatically occur automatically in response to any viewing, modifying, or

adding metadata (thus none of these events can be “triggers”). Furthermore, as used in claim 1, a “file operation,” can be an action such as opening, closing, reading, and/or writing of a file. *See e.g.* ¶ 166 of the present specification. Thus, McCotter does not discuss that any actions are automatically performed as a result of a “file operation” as recited in claim 1.

Thus, for at least these reasons, claim 1 is patentable over the combination of Delaire and McCotter.

Claims 2-3, and 5-34, which depend from independent claim 1, are patentable for at least the same reasons discussed above with respect to independent claim 1.

In the Office Action dated May 31, 2007, the Examiner rejected claims 1 and 26 using the same rationale. Applicants respectfully request that the Examiner consider claims 1 and 26 separately because there are a number of limitations that are not common to the two claims. For example, claim 26 recites several limitations not recited in claim 1 such as “publish information related to usage of the electronic files,” “facilitate a historical view showing usage of the electronic files,” “the electronic files are inhibited from leaving control of the system,” “facilitate coherency between selected ones of the electronic files using the published information,” and “configured to receive the published information.” As the Applicants respectfully assert that the Examiner did not address at least the limitations discussed in the previous sentence, Applicants respectfully assert that the Examiner has not established a *prima facie* case of obviousness as required. *See e.g.* M.P.E.P. § 2143 (“the prior art reference (or references when combined) must teach or suggest all the claim limitations.” (emphasis added)).

Notwithstanding Applicants’ assertion that a *prima facie* case of obviousness has not been established, Delaire in view of McCotter does not teach, disclose, suggest, or make obvious a computerized system as recited in claim 26.

The Examiner cites various portions of Delaire as disclosing the volume manager recited in claim 26. While Delaire uses the phrase “volume manager,” the volume manager discussed in Delaire is different from the volume manager recited in claim 26. Delaire discusses a system that manages a storage area network having hosts that are coupled with storage devices via an interconnect fabric. Col. 21, ll. 33. The management of the storage area network is limited to the structure of the overall storage area network

and not individual files contained therein. *See e.g. id.* at Figures 1-2, col. 21, ll. 29-44, col. 22, ll. 48-63. For example, Delaire collects information allowing it to discern the makeup, topology, and status of the storage area network and its components in order to implement policies such as assignment of a storage device to a host (i.e. not management of individual files). *Id.*, col. 22, ll. 48-56. Furthermore, Delaire does not disclose that the volume manger discussed therein is configured i) to publish information related to usage of electronic files, ii) to facilitate a historical view showing usage of the electronic files, and iii) such that the electronic files are inhibited from leaving control of the system; all as recited by claim 26.

McCotter does not make up for the deficiencies noted above with respect to Delaire, nor does the Examiner assert as much. As such, claim 26 is patentable for at least the reasons discussed above.

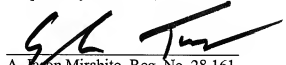
Claims 28-32, which depend from independent claim 26, are patentable for at least the same reasons discussed above with respect to independent claim 26.

**Conclusion**

Based on the foregoing, this application is believed to be in allowable condition, and a notice to that effect is respectfully requested. If a telephone conversation with Applicant's representative would help expedite the prosecution of this application, the Examiner is invited to call the undersigned attorney at (617) 542-6000.

The Director is hereby authorized to charge any fees which may be required, or credit any overpayment, to Deposit Account 50-0311, Reference No. 25396-006. The Director is further authorized to charge any required fee(s) under 37 C.F.R. §§ 1.19, 1.20, and 1.21 to the abovementioned Deposit Account.

Respectfully submitted,



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